

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ROYAL INDIAN RAJ
INTERNATIONAL CORPORATION,

Plaintiff,

v.

DOMAINS BY PROXY, INC.,
WESTHOST, INC.,
BILL ZACK,
ANN ZACK,
DIRECT INFORMATION PVT LTD.
(d/b/a DIRECTI)
PIRADIUS NET, and
JOHN DOES 1-7

Defendants

08-cv-03445

Hon. John G. Koeltl

**WILLIAM ZACK'S ANSWER TO
AMENDED COMPLAINT**

NOW COMES the defendant, William Zack, by and through his attorneys, Cleveland, Waters and Bass, P.A., and Answers the Plaintiff's Amended Complaint, paragraph by paragraph as follows:

1. The defendant lacks sufficient information to form a belief as to the truth of paragraph 1 and therefore denies same.

2. The defendant lacks sufficient information to form a belief as to the truth of paragraph 2 and therefore denies same.

3. The defendant lacks sufficient information to form a belief as to the truth of paragraph 3 and therefore denies same.

4. The defendant lacks sufficient information to form a belief as to the truth of paragraph 4 and therefore denies same.

5. The defendant lacks sufficient information to form a belief as to the truth of paragraph 5 and therefore denies same.

6. Admitted.

7. The defendant lacks sufficient information to form a belief as to the truth of paragraph 7 and therefore denies same.

8. Admitted.

9. Admitted.

10. The defendant lacks sufficient information to form a belief as to the truth of paragraph 10 and therefore denies same.

11. The defendant lacks sufficient information to form a belief as to the truth of paragraph 11 and therefore denies same.

12. The defendant lacks sufficient information to form a belief as to the truth of paragraph 12 and therefore denies same.

13. The defendant lacks sufficient information to form a belief as to the truth of paragraph 13 and therefore denies same.

14. Admitted.

15. The defendant lacks sufficient information to form a belief as to the truth of paragraph 15 and therefore denies same.

16. The defendant lacks sufficient information to form a belief as to the truth of paragraph 16 and therefore denies same.

17. Paragraph 17 contains a legal conclusion to which no response is required. Otherwise denied.

18. Paragraph 18 contains a legal conclusion to which no response is required. Otherwise denied.

19. Denied.

20. Denied.

21. Denied.

22. Admitted that individuals, including the defendant Bill Zack, have given money to RIRIC. Otherwise denied.

23. Denied.

24. Admitted.

25. Denied.

26. Denied.

27. Admitted that Bill Zack's employment ended. Otherwise denied.

28. Admitted as to the allegation against Bill Zack. Otherwise denied.

29. Admitted.

30. Denied.

31. Denied.

32. Denied.

33. Admitted.

34. Paragraph 34 refers to a website, the content of which speaks for itself. Otherwise denied.

35. Admitted.

36. Admitted.

37. Admitted.

38. Denied.

39. Admitted.

40. Admitted.

41. The defendant lacks sufficient information to form a belief as to the truth of paragraph 41 and therefore denies same.

42. Admitted.

43. Denied.

44. Admitted.

45. Denied.

46. Denied.

47. Admitted.

48. Denied.

49. Denied.

50. Admitted.

51. Denied.

52. Admitted that Mr. Baines wrote and published articles in March and April, 2008. Otherwise denied.

53. Admitted.

54. Denied.

55. Denied.

56. Denied.

57. Denied.

58. Denied.

59. Denied.

60. Denied.

61. The defendant lacks sufficient information to form a belief as to the truth of paragraph 61 and therefore denies same.

62. The defendant repeats and realleges its response to the paragraphs 1 through 61 as set forth above.

63. Denied.

64. Denied.

65. Denied.

66. Denied.

67. The defendant repeats and realleges its response to the paragraphs 1 through 66 as set forth above.

68. Denied.

69. Denied.

70. Denied.

71. The defendant repeats and realleges its response to the paragraphs 1 through 70 as set forth above.

72. The defendant lacks sufficient information to form a belief as to the truth of paragraph 72 and therefore denies same.

73. Denied.

74. Denied.

75. Denied.

76. Mr. Zack denies that the plaintiff is entitled to any of the relief sought in its prayers for relief.

Respectfully submitted

WILLIAM ZACK
By and through her Attorneys,
CLEVELAND, WATERS AND BASS, P.A.

Date: September 5, 2008

By: /s/ William B. Pribis
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been forwarded this 5th day of September, 2008 to Matthew David Brozik, Esquire.

/s/ William B. Pribis
William B. Pribis